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April 15, 2008

The Honorable William H. Pauley
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Ship Concepts Ltd. v. Klouberg Shipping Line, 07 CV 10581 (WHP)

Dear Judge Pauley:

We represent plaintiff, Ship Concepts Ltd., in this matter. We write to request a postponement of the initial pre-trial conference scheduled for April 16, 2008. The pretrial conference in this matter was originally scheduled for February 29, 2008, and plaintiff requested an adjournment to April 4, 2008. Thereafter, the Court adjourned the hearing to its current date.

As the Court may recall, the Court signed an Order on November 28, 2007, authorizing issuance of Supplemental Rule B process of maritime attachment and garnishment ("PMAG") in this maritime action. Unfortunately, we have not, as yet, attached any of defendant's property, and thus have not yet served or notified defendant of this action. However, the underlying arbitration proceedings are underway. At this stage, an application to appoint an arbitrator has been formally served on the defendant at its registered address in the Marshall Islands. As per the Order of the High Court, defendant now has 32 days to serve an acknowledgement of Service.

Nevertheless, given that no assets have been attached, we have asked for further instructions as to whether the current action will be maintained or discontinued voluntarily. For these reasons, we respectfully request an additional brief postponement of the pre-trial conference so that we can obtain further instructions from the client regarding this matter.

We thank the Court for its attention to this matter.

Respectfully submitted,

BROWN GAVALAS & FROMM LLP

Peter Skoufalos
Petr Skoufalos

*Application granted.
The conference is adjourned
until May 9, 2008 at 3:00pm.*

SO ORDERED:

William H. Pauley
WILLIAM H. PAULEY III U.S.D.J.
4/15/2008